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June 24, 2025

BY EMAIL

AUSA Eli Mark
AUSA Rebecca Delfiner
AUSA James Mandilk
U.S. Attorney's Office
Southern District of New York
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New York, NY 10278
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Re: *United States v. Taylor*, 24 Cr. 524 (JLR)

Dear Mr. Mark, Ms. Delfiner and Mr. Mandilk:

Pursuant to the Court's Order dated June 11, 2025 (ECF # 56), please see below.

Potential Defense Witnesses:

1. Simona Andrejic
2. Sofia Barash
3. Charles Best
4. Maria Bianco
5. Peter Blum
6. Irving Boswick
7. Sylvain Brunel
8. Maria Castillo
9. Joan Casali
10. Yan (Alex) Chan
11. Charles Cissel
12. Melanie Cochran
13. Ziv Cohen
14. Shayla Colon
15. Don Evans
16. Thomas Fattorusso

17. Gabriella Galindo
18. Anne-Marie Galvin
19. Benjamin Goldburd
20. Joseph Goldburd
21. Steven Goldburd
22. Lisa Guida
23. Noel Howe
24. Gabrielle Hoessly
25. LaVale Jackson
26. Amy Krebs
27. Jonathan Larsen
28. George Liakeas
29. Robert Malone
30. Randell Martin
31. Forrest Mason
32. Megan McDowell
33. Candice Meth
34. Andrew Miltenberg
35. Shahzad Mossanen
36. Rosa Ng
37. Dennis Powers
38. Nestor Ramos
39. Russell Richardson
40. Desiree Rogers
41. Mara Rogers
42. Iris Rosken
43. Cesar Sabando
44. Todd Spicer
45. Samuel Stillman
46. Keith Taylor
47. Manuel Zoquier
48. Mac Wilcox
49. One or more witnesses related to the Internal Revenue Service's Exempt Organizations Unit

Mr. Taylor may identify additional potential witnesses and/or may decide not to call certain witnesses as the defense continues trial preparation.

Potential Defense Exhibits:

An index of exhibits Mr. Taylor may introduce at trial is included. Mr. Taylor may identify additional potential trial exhibits as the defense continues trial preparation.

Reciprocal Discovery:

Enclosed is a USB drive containing reciprocal discovery. *See* DX-1 – DX-16. Should additional Rule 16(b) material be identified, it will be promptly produced to the Government under separate cover.

Authentication of Proposed Government Exhibits:

The defense does not intend to object to the authenticity of the 33 documents listed in Exhibit A to the Government's June 4, 2025 supplemental motion *in limine* (ECF # 48).

Advice of Counsel Defense:

The defense remains in the process of determining whether Mr. Taylor will assert an advice of counsel defense at trial and requests one additional day, until June 25, to advise the Government of its position on this issue.

Government Witnesses:

We request that the Government identify its witnesses who are represented by counsel and provide to us their names and contact information.

Very truly yours,

/s/Brian P. Ketcham/Sabrina P. Shroff

Brian P. Ketcham

Sabrina P. Shroff

Counsel to Defendant Keith Taylor